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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS AMEZOLA,

Defendant.

CASE NO. 1:23-CR-00237-JAM-BAM

STIPULATION AND ORDER TO CONTINUE
STATUS CONFERENCE

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney and Robert L. Veneman-Hughes, Assistant U.S. Attorney and Kara R. Ottervanger, attorney for defendant Carlos Amezola, that the status conference set for August 28, 2024 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to February 26, 2025 at 1:00 p.m.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. The parties need additional time to further investigate/explore matters related to resolving the case or setting a trial date.

2. By this stipulation, defendant now moves to continue the status conference, and to exclude time from August 28, 2024 to February 26, 2025.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes investigative reports, and related documents, photographs, etc., in electronic form.

1 Initial discovery has been either produced directly to counsel and/or made available for
2 inspection and copying. A large batch of supplemental discovery was produced to defense
3 counsel on August 7, 2024. The Government believes there will be a second set of supplemental
4 discovery forthcoming.

5 b) Defense counsel requires additional time to review the voluminous additional
6 discovery and investigate.

7 c) The government does not object to the continuance.

8 d) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period from August 28, 2024 to February 26,
13 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and 18 U.S.C.
14 § 3161(h)(7)(B)(iv) because it results from a continuance granted by the Court at defendant's
15 request on the basis of the Court's finding that the ends of justice served by taking such action
16 outweigh the best interest of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20
21 Dated: August 12, 2024

Respectfully submitted,

22 PHILLIP A. TALBERT
23 United States Attorney

24 By /s/ Robert L. Veneman-Hughes
25 ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

26 Dated: August 12, 2024

/s/ Kara Ottervanger
27 KARA OTTERVANGER
28 Attorney for Carlos AMEZOLA

ORDER

IT IS SO ORDERED that the status conference is continued from August 28, 2024, to **February 26, 2025, at 1:00 p.m. in Courtroom 8** before Magistrate Judge Barbara A. McAuliffe. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: August 12, 2024

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE